



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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February 3, 2016

**BY ECF**

Hon. Alvin K. Hellerstein  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Jane Doe, et al., v. City of New York, et al., 15-CV-3849 (AKH)

Your Honor:

We write in order to request an extension of the date by which the City will move to modify the protective order in this case which allows plaintiffs Jane Doe 1 and Jane Doe 2 to proceed anonymously. Currently, the motion is due on or before Friday, Feb. 5, 2016. We request an extension of two (2) weeks of the date by which the City must file this motion, to Feb. 19, 2016, and a corresponding extension of the dates by which all opposition and reply papers are due, as well. Plaintiffs do not oppose this request. We request additional time because the undersigned and co-counsel Kimberly M. Joyce have been engaged in discovery and motion practice in several other matters, and because we are continuing to review closely the facts of this case and the law applicable to our motion. If granted, this request would result in the following briefing schedule for the anticipated motion: (i) all motion papers due on or before Feb. 19, 2016, (ii) all opposition papers due on or before March 4, 2016, and (iii) all reply papers due on or before March 11, 2016.

Respectfully submitted,

/s/

Arthur G. Larkin  
Senior Counsel

cc: All Counsel (by ECF)